

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DISCOVERORG DATA, LLC,

Plaintiff,

v.

GUIDA ADVISORY SERVICES, INC.,

Defendant.

Case No. 1:19-cv-19651-RMB- AMD

**PLAINTIFF'S NOTICE OF MOTION
TO SEAL**

Electronically Filed

PLEASE TAKE NOTICE that on **July 6, 2020**, or as soon thereafter as counsel may be heard, Plaintiff ZoomInfo Technologies LLC f/k/a DiscoverOrg Data, LLC ("DiscoverOrg") shall move for an Order pursuant to Local Civil Rules 5.3(c) and 7.1 to seal:

1. Portions of the Declarations of Philip Watson and Jie Smith, filed in support of Plaintiff's motion for default judgment against Defendant Guida Advisory Services, Inc. ("Guida"), pursuant to Rule 55 of the Federal Rules of Civil Procedure; and
2. Portions of the Memorandum of Law submitted by Plaintiff in support of Plaintiff's motion for default judgment pursuant to Rule 55 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the Declaration of Mark A. Saloman, Esq. submitted herewith, as well as all other pleadings, Declarations and memoranda filed in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

FORD HARRISON LLP

s/ Mark A. Saloman

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